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December 10, 2014

BY ELECTRONIC MAIL

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

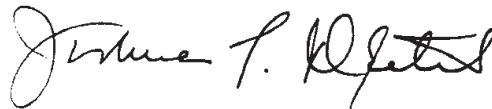
Re: *United States v. Ross Ulbricht*
14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of defendant Ross Ulbricht, in regard to the Joint Proposed Request to Charge, due today, December 10, 2014. We are currently finishing our redlining of the government's proposed Request to Charge. After consulting with the government, two options exist: we can either send the redlined version of the Request to Charge to the court tonight, or we can send it to the government to see if there are any additional areas in which we are able to reach agreement. If the Court prefers the latter option, the government would submit a version of the Request to Charge tomorrow, Thursday, December 11, 2014, that incorporates those instructions upon which we are able to reach agreement, and highlights areas still in dispute.

We will await the Court's instructions before either submitting the redlined Request to Charge as it currently stands to the Court, or instead, submitting it tonight to the government.

Respectfully submitted,



Joshua L. Dratel

JLD/lal

cc: Serrin Turner & Timothy Howard
Assistant United States Attorneys

ORDERED:
Submit tonight to the Government.



12/10/14

United States District Judge